

December 20, 2018

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE

GN Docket No. 18-122: *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*

GN Docket No. 17-183: *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*

RM-11791: *Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band*

RM-11778: *Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service*

Dear Ms. Dortch:

On December 18, 2018, Courtney Neville and I of Competitive Carriers Association (“CCA”),¹ met with Will Adams, Legal Advisor to Commissioner Brendan Carr; and Umair Javed, Legal Advisor, Wireless and International, to Commissioner Jessica Rosenworcel, to discuss the above referenced proceedings. On December 19, 2018, CCA met with Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai, to discuss the same.

During the meetings, CCA explained that spectrum in the 3.7-4.2 GHz band (“C-Band”) presents a critical opportunity to make mid-band spectrum available for current and next-generation wireless networks. Because of the important role that the C-Band can play for terrestrial wireless services, the Federal Communications Commission (“FCC” or “Commission”) should first focus on clearing the maximum amount possible for terrestrial services.² In CCA’s view, the FCC should, at an absolute minimum, aim to clear at least 320 megahertz of spectrum for terrestrial services, including a 20-megahertz guard band.³ Indeed, at this stage, there is no reason to take off the table the possibility of repurposing all 500 megahertz.

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents vendors and suppliers that provide products and services throughout the communications supply chain.

² While the Commission works to clear incumbent users and repurpose the spectrum for terrestrial services, it should likewise acknowledge legitimate concerns raised in the record regarding unique issues in Alaska and other distinct areas. *See, e.g.*, Comments of General Communication Inc., GN Docket No. 18-122 at 21 (filed Oct. 29, 2018); Comments of General Communication Inc., GN Docket No. 17-183 at 2 (filed Oct. 2, 2017).

³ *See, e.g.*, Comments of Competitive Carriers Association, GN Docket No. 18-122 (filed Oct. 29, 2018); Reply Comments of Competitive Carriers Association, GN Docket No. 18-122 (filed Dec. 11, 2018).

CCA also emphasized the importance of giving all interested parties a fair opportunity to acquire C-Band spectrum at reasonable prices. While recent Commission-led auctions have contained transparent and inclusive procedures, the record does not currently establish how a private sale mechanism would similarly ensure competitive access to spectrum. The private sale approach also risks generating an improper windfall for incumbent operators at the expense of U.S. taxpayers. The FCC also should further explore policies to curb anti-competitive aggregation practices and ensure interoperability across the band.

CCA looks forward to continued work with the Commission and industry to ensure that C-Band spectrum is available to all parties so that next-generation services are deployed quickly and competitively.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Alexi Maltas

Alexi Maltas
SVP & General Counsel
Competitive Carriers Association

cc (via email): Will Adams
Rachael Bender
Umair Javed